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MS#160297.01 (4936)
PATENT**REMARKS**

Applicant has thoroughly considered the May 20, 2005 Office action and the Examiner's remarks. Applicant has amended the application to more clearly set forth the invention. Claims 1-51 are presented in the application for further examination. Claims 1-2, 18, 21, 27-28, 35, 38, 41, 43-44, and 51 have been amended by this Amendment C. Reconsideration of the application as amended and in view of the following remarks is respectfully requested.

Claim Rejection under 35 U.S.C. § 103(a)

Claims 1-8, 14-18, 21, 27, 35-37, 41-46, and 51 were rejected under 35 U.S.C. § 103(a) as being obvious over Malamud et al., U.S. Patent No. 5,694,561 ("Malamud patent") and Beaudet et al., U.S. Patent No. 5,491,795 ("Beaudet patent"). Applicant respectfully disagrees and argues that the combined references fail to teach or suggest each and every element of the claims as amended. In particular, the combined references fail to teach or suggest at least the combination of specifying the first and second independent sets of instructions defining first and second primary objects to be displayed in first and second primary display windows, respectively.

Amended claim 1 recites, in part:

forming a scope window displaying in a hierarchical structure a plurality of scope items therein; allowing a user to select at least one of the displayed plurality of scope items in the scope window; receiving from a user and/or an administrator a first set of instructions defining one or more first primary objects to be displayed in a first primary display window; forming the first primary display window in response to the selected scope item and in response to the first set of instructions for displaying the one or more first primary objects in the first primary display window; receiving from a user and/or an administrator a second set of instructions defining one or more second primary objects to be displayed in a second primary display window, wherein the first set of instructions is independent of the second set of instructions so that the one or more first primary objects displayed in the first primary display window are independent of the one or more second primary objects displayed in the second primary display window....

As amended, embodiments of the invention provide dynamic linking windows to allow administrators and/or users to create, organize and link windows independent of each other. For example, dynamic linking means that content of windows, the placement of windows and the

relationship between windows can be created, defined and controlled by administrators or users. As such, the user or administrator may specify the combination of the first and second sets of instructions defining first and second primary objects displayed in first and second primary display windows, respectively. (See also, Application, page 1, lines 21-27; page 2, lines 1-13).

In contrast, neither the Malamud patent nor the Beaudet patent teaches or suggests such a combination. For example, the Malamud patent merely discloses that window 203 includes content when a user selects an item, such as "Quartz" in window 201. The Malamud patent fails to disclose or suggest that a user may define, create or link objects in window 203 to the selected item in window 201. In addition, Applicant again disagrees with Examiner's interpretation that window 207 is a second primary display window because the second primary display window, as recited, is formed in response to the particular selected scope item as the selected scope item that drives the first primary display window. **In other words, the first and second primary display windows are formed in response to the particular selected scope item by the user/administrator.** Because of the first set of instructions and the second set of instructions are independent of each other, at least the content, placement and the relationship of the first primary display window and the second primary display window are also independent of each other.

Furthermore, the Beaudet patent fails to cure the deficiency of the Malamud patent. While the Beaudet patent discloses a hierarchical structure of scope items displayed in the scope window, the Beaudet patent also fails to disclose or suggest specifying instructions for defining first primary objects to be displayed in a first primary display window. In fact, both the Malamud and Beaudet patents teach away from the present invention by disclosing that the linking of the content of the windows are the same and are hard-coded – exactly some of the shortcomings of prior systems that the present invention attempts to overcome.

Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection because the combined references of the Malamud and Beaudet patents fail to teach or suggest each and every element of the invention in combination. As such, claim 1 and its dependent claims 2-8 and 14-17 are patentable over the cited art. Therefore, the rejection of claims 1-8 and 14-17 under 35 U.S.C. §103(a) should be withdrawn.

Similarly, amended claim 18 recites, in part, "a first primary display window ... dynamically linked to the selected scope item as defined by a first set of instructions specified by the user; and a second primary display window ... dynamically linked to the particular selected

scope item as defined by a second set of instructions specified by the user... ". For at least the reasons argued above in claim 1, Applicant argues that the Examiner has not established the *prima facie* elements of an obviousness rejection because the combined references fail to teach or suggest the combination discussed above. As such, claim 18 is patentable over the cited art, and the rejection of claim 18 under 35 U.S.C. §103(a) should be withdrawn.

Amended claim 21 provides similar recitals, such as, for "receiving from the user a first set of instructions for defining one or more first primary objects to be displayed in a first primary display window...; receiving from the user a second set of instructions for defining one or more second primary objects to be displayed in a second primary display window...". Because neither the Malamud patent nor the Beaudet patent teaches or suggests at least the combination, Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection. As such, claim 21 is patentable over the cited art. Therefore, Applicant respectfully requests the rejection of claim 21 under 35 U.S.C. §103(a) be withdrawn.

Amended claim 27 also recites, in part, "means for receiving from a user a first set of instructions for defining first primary objects to be displayed in a first primary display window and for receiving from the user a second set of instructions for defining second primary objects to be displayed in a second primary display window...." Because the combined references fail to teach or suggest the combination of the first and second sets of instructions that define first and second primary objects, respectively, Applicants submits that claim 27 is also patentable over the cited art.

Amended claim 35 similarly recites, in part, a computer system comprising "means for receiving from the user a first set of instructions for defining first primary objects to be displayed in the first primary display window and for receiving from the user a second set of instructions for defining second primary objects to be displayed in the second primary display window...". As argued previously, the combined references of the Malamud and Beaudet patents fail to teach or suggest at least the combination of the first and second sets of instructions of embodiments of the invention. Therefore, Applicant submits that claim 35 and its dependent claims 36-37 and 51 are patentable over the cited art and the rejection under 35 U.S.C. §103(a) should be withdrawn.

Similarly, amended claims 41, 43, and 44 recite at least the features that include the combination of specifying the first and second independent sets of instructions defining first and second primary objects to be displayed in first and second primary display windows,

respectively. As such, Applicant argues that the Examiner fails to establish the *prima facie* elements of an obviousness rejection and requests that the rejection of claims 41-46 under 35 U.S.C. §103(a) be withdrawn.

Claims 9-13, 19-20, 22-26, 28-34, and 38-40 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Malamud patent, the Beaudet patent and Ku et al. U.S. Patent No. 6,421,072 ("Ku patent"). The Ku patent, in addition to discussions and arguments presented in previous Amendments, merely teaches an improved way to represent information in multi-window environment using a tree structure. Like the Malamud and the Beaudet patents, the Ku patent fails to teach or suggest dynamically linking objects in response to instructions from the user. Applicant argues that, because the Ku patent fails to cure the deficiencies of both the Malamud and Beaudet patents, the combined references fail to teach or suggest each and every element of the invention in combination. Claims 9-13 depend from claim 1, claims 19-20 depend from claim 18, and claims 22-26 depend from claim 21 and, for at least the reasons explained above, these dependent claims are patentable over the cited art for at least the reasons of claims 1, 18, and 21, respectively. As such, rejection of claims 9-13, 19-20, and 22-26 under 35 U.S.C. §103(a) should be withdrawn.

Amended claim 28 recites "dynamically linking the first primary objects to the selected scope item in accordance with a first set of instructions from the user or administrator... dynamically linking the second primary objects to the particular selected scope item in accordance with a second set of instructions from the user or administrator...". Applicant argues that the Examiner fails to give full weight of the amendment as previously presented and argues that the scope of claim 28 is not the same as that of claim 9. Because the combined references of the Malamud, Beaudet, and Ku patents continue to fail to teach or suggest the dynamic linking feature of embodiments of the invention as recited, Applicant argues that the Examiner fails to establish the *prima facie* elements of an obviousness rejection. Therefore, Applicant requests that the rejection of claim 28 and its dependent claims 29-34 under 35 U.S.C. §103(a) be withdrawn.

Amended claim 38 recites, in part, a computer system comprising "means for receiving from the user a first set of instructions for defining first primary objects... and for receiving from the user a second set of instructions for defining second primary objects... ". Again, the combined references fail to discuss or suggest that the combination that the user can specify the

first and second sets of instructions to define first and second primary objects to be displayed in the first and second primary display windows, respectively, in the Malamud, Beaudet, and Ku patents. Because the Examiner fails to establish the *prima facie* elements of an obviousness rejection, Applicant submits that the rejection of claim 38 and its dependent claims 39-40 under 35 U.S.C. §103(a) be withdrawn.

Claims 47-49 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Malamud patent in view of Winamp (version 2.10, released 03/24/99) ("Winamp reference"). Applicant respectfully disagrees and argues that the combined references continue to fail to teach or suggest each and every element of the invention. In particular, the Winamp reference fails to show that **"movement of one adjacent edge causes movement of the other adjacent edge..."**. In fact, as further illustrated in FIGS. A-D of Applicant's Exhibit 1, Exhibit A and page 1 of the Winamp reference merely show that one or more edges of the one or more windows may dock with another edge(s) of one or more other windows. As such, Applicant respectfully requests that either the Examiner provides additional evidence showing at least the feature of relative movement of adjacent edges or the Examiner withdraws the rejection. Therefore, Applicant submits that the Examiner fails to establish the *prima facie* elements of an obviousness rejection and requests that rejection of claims 47-49 under 35 U.S.C. §103(a) be withdrawn.

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PATENT**CONCLUSION**

In light of the foregoing, Applicant respectfully submits that claims 1-51 are in condition for allowance and respectfully request favorable reconsideration of this application. The fact that Applicant may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicant's agreement therewith.

Applicant wishes to expedite prosecution of this application. If the Examiner deems the claims as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency or overpayment of any required fee during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,



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